

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

LINDA THORNTON,

Plaintiff,

V.

FLAVOR HOUSE PRODUCTS, INC., and

FRANKLIN D. WILLIAMS, JR.,

Defendants.

Civil Action No.: 1:07cv712-WKW

DEFENDANT FRANKLIN D. WILLIAMS, JR.'S
MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56 of the *Federal Rules of Civil Procedure*, Defendant Franklin D. Williams, Jr. (“Williams”) moves for summary judgment as to the Plaintiff’s claims against him. As grounds for this motion, Williams states that the conduct alleged by the Plaintiff is not legally sufficient to state claims against Williams for outrage and invasion of privacy, and Williams is entitled to judgment as a matter of law.

In support of this motion, Williams relies on the Brief in Support of Defendant Flavor House Products, Inc.'s Motion for Summary Judgment and Flavor House's Evidentiary Submission filed today. Williams is entitled to summary judgment on the Plaintiff's outrage and invasion of privacy claims for the same reasons articulated by Flavor House in its Brief. As Flavor House's Brief and Evidentiary Submission demonstrate, there is no genuine issue of material fact and Williams is entitled to judgment as a matter of law.

/s/ Richard E. Crum
 RICHARD E. CRUM
 One of the Attorneys for Defendant
 Franklin D. Williams, Jr.

OF COUNSEL:

Shealy, Crum & Pike, P.A.
P.O. Box 6346
Dothan, Alabama 36302-6346
Telephone: (334) 677-3000

CERTIFICATE OF SERVICE

I hereby certify that this pleading has been filed electronically, with copies served thereby, on August 8, 2008.

Ann C. Robertson, Esq.
Temple D. Trueblood, Esq.
Wiggins, Childs, Quinn & Pantazis, L.L.C.
The Kress Building
301 19th Street North
Birmingham, Alabama 35203

Bobbie S. Crook, Esq.
367 South Saint Andrews Street
Dothan, Alabama 36301

Jennifer F. Swain
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC
1600 Wachovia Tower
420 20th Street North
Birmingham, AL 35203
Telephone: (205) 244-3863
Facsimile: (205) 488-3863

/s/ Richard E. Crum
RICHARD E. CRUM
One of the Attorneys for Defendant
Franklin D. Williams, Jr.